

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

STANFORD INTERNATIONAL BANK,
LTD., ET AL.,

Defendants.

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Case No.: 3:09-cv-0298-N

**ALLEN STANFORD'S MOTION TO COMPEL PRODUCTION
FROM THE RECEIVER AND REQUEST FOR EXPEDITED CONSIDERATION**

Allen Stanford ("Stanford"), moves the Court to compel the Receiver to produce the documents requested in Defendant R. Allen Stanford's First Request for Production to Receiver Ralph S. Janvey. Obtaining the requested documents as soon as practicable is essential for Stanford to conduct and respond to discovery, to fulfill other obligations imposed on him in this matter, and to prepare his defenses to the claims asserted against him by the SEC. Because Stanford needs the requested documents as soon as possible and the normal briefing schedule would defeat the Court's order that discovery be expedited, Stanford respectfully requests that the Court set his motion for hearing as soon as possible. The grounds for this motion are set forth in greater detail in the accompanying memorandum of law.

Dated: May 22, 2009

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I, Paul D. Flack, hereby certify that on May 14, 2009 I conferred with Kevin Sadler, counsel for the Receiver, and for reasons set forth in its objections to the Request for Production, the Receiver opposes this motion.

/s/ Paul D. Flack
Paul D. Flack

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record via the Court's electronic filing system on May 22, 2009.

/s/ Paul D. Flack

Paul D. Flack